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Attorney for Defendant,

COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ASHLY RAI, individually,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION, a
Foreign Corporation, DOES I through X,
inclusive; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

Case No. 2:24-cv-00161-JAD-EJY

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES (FIFTH REQUEST)

Defendant, COSTCO WHOLESALE CORPORATION (Defendant), by and through their attorneys of record, GEORGE M. RANALLI, ESQ. and MAEGUN C. MOOSO, ESQ. of the law firm RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff, ASHLY RAI (Plaintiff), by and through her attorneys of record SRILATA SHAH, ESQ. of PAUL PADDA LAW, PLLC to hereby request this Honorable Court to extend the deadlines as requested herein.

I. LOCAL RULE 6-1 IS SATISFIED

This is the fifth request for an extension of discovery deadlines filed by the parties. This

Stipulation and request for extension of discovery dates is made more than twenty-one (21) days before the expiration of the deadline for discovery in this case, which is currently April 4, 2025.

Pursuant to the controlling Discovery Plan, the following dates govern for purposes of discovery:

1. Discovery Cutoff Date: April 4, 2025
2. Initial Expert Disclosure: Passed.
3. Rebuttal Expert Disclosure: March 3, 2025
4. Dispositive Motions: May 5, 2025
5. Joint Pre-Trial Order: June 3, 2025

The parties have been working diligently in trying to resolve this matter and proceeded to a mediation in December of 2024, which unfortunately did not result in resolution. The parties are still tentatively discussing possible resolution of this matter, but have decided to proceed with certain needed depositions of Defendant FRCP 30(b)(6) witnesses, Plaintiff treating doctors and lay witnesses, and expert witnesses of both parties in the interim. The parties are also attempting to resolve discovery dispute issues concerning discovery responses and FRCP 30(b)(6) topics, which may necessitate motion practice if the parties are unable to reach an agreement. The parties therefore are requesting an extension of sixty (60) days to present open deadlines within which to undergo these depositions (and ideally continue settlement negotiation discussions, which these aforementioned depositions may assist in facilitating); and resolve potential discovery disputes or otherwise prepare and file the necessary motions before the Court on those issues.

Based on the foregoing, the parties have agreed to the extension.

The instant request comports with Local Rule 6-1, in that no request is made after the expiration of the specified period.

II. THE FOLLOWING DISCOVERY HAS BEEN COMPLETED

1. Plaintiff's Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
2. Plaintiff's First Supplement to Initial List of Witnesses and Documents Pursuant to FRCP 26(a);

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3. Plaintiff's Second Supplement to Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
4. Plaintiff's Third Supplement to Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
5. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
6. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
7. Defendant's Second Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
8. Defendant's First Set of Requests for Admissions to Plaintiff;
9. Plaintiff's Responses to Defendant's First Set of Request for Admissions;
10. Defendant's First Set of Requests for Interrogatories to Plaintiff;
11. Plaintiff's Responses to Defendant's First Set of Interrogatories;
12. Defendant's First Set of Requests for Production of Documents to Plaintiff;
13. Plaintiff's Responses to Defendant's First Set of Request for Documents;
14. Plaintiff's Interrogatories to Defendant;
15. Defendant's Responses to Plaintiff's Interrogatories;
16. Plaintiff's Requests for Production of Documents to Defendant;
17. Defendant's Responses to Plaintiff's Requests for Production of Documents;
18. Deposition of Plaintiff;

Under Local Rule 26-3(d), it is necessary to articulate a proposed schedule for completing all remaining discovery. The parties are requesting only the expert and rebuttal deadline be extended.

The following deadlines are requested.

- | | |
|--------------------------------|----------------|
| 1. Discovery Cutoff Date: | June 03, 2025 |
| 2. Initial Expert Disclosure: | CLOSED |
| 3. Rebuttal Expert Disclosure: | April 05, 2025 |
| 4. Dispositive Motions: | July 03, 2025 |

5. Joint Pre-Trial Order:

August 02, 2025

The parties hereby stipulate to the proposed changes in the discovery deadlines.

IT IS SO STIPULATED.

February 26, 2025

February 26, 2025

RANALLI ZANIEL FOWLER & MORAN, LLC

PAUL PADDA LAW, PLLC.

/s/ George M. Ranalli

/s/ Srilata R. Shah

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Attorney for Defendant

Attorneys for Plaintiff

ORDER

IT IS HEREBY ORDERED.

DATED this 26th day of February, 2025.


UNITED STATES MAGISTRATE JUDGE

Respectfully Submitted By:

RANALLI ZANIEL FOWLER & MORAN, LLC

/s/ George M. Ranalli

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